



SILVERMAN|THOMPSON|SLUTKIN|WHITE
ATTORNEYS AT LAW

A Limited Liability Company

26th Floor
201 North Charles Street
Baltimore, Maryland 21201

Telephone (410) 385-2225
Facsimile (410) 547-2432
www.mdattorney.com

Baltimore Washington DC New York

November 28, 2018

VIA CM/ECF

The Honorable Ellen L. Hollander
U.S. District Court for the District of Maryland
101 West Lombard Street
Baltimore, Maryland 21201

Re: *Burley, et al. v. Baltimore Police Department, et al.*
Civil No. ELH-18-01743

Dear Judge Hollander,

I represent Plaintiffs in the above-referenced matter. Pursuant to a prior agreement reached by the parties, defendants' response to plaintiffs' amended complaint would be due today. However, since reaching that agreement, plaintiffs have expressed their desire to defendants to file a second amended complaint (at this time, I have represented to opposing counsel and can represent to the Court that the second amended complaint will not add any new counts).¹ Plaintiffs have worked with defendants to establish the following dates as to when filings would be due and when defendants' response would be due. These dates are acceptable to all parties, particularly considering that the holidays are approaching.

Those dates are as follows:

December 21, 2018	Plaintiffs' Second Amended Complaint due
January 25, 2019	Defendants' Response due
February 22, 2019	Plaintiffs' Response to any 12(b) Motion due
March 15, 2019	Defendants' Reply in Support of 12(b) Motion due

Given that all parties consent to the foregoing, the liberal standard for leave allowed for under Rule 15 of the Federal Rules of Civil Procedure, and that the parties do not anticipate the

¹ Note that defendants' counsel have consented to the above proposal based upon my representation that, at this time, no new counts against existing defendants will be added to the second amended complaint. In addition, at this time Plaintiff is considering adding new defendants. Should Plaintiffs' position on the new claims change, or should Plaintiff's confirm that they will be adding defendants, I will notify defendants' counsel, and defendants reserve the right to oppose the second amended complaint.

need for the any further amendments or adjustment to the foregoing schedule, the parties are proceeding by this letter. Should the Court require a motion for leave and/or request for a scheduling order in lieu thereof, the parties will, of course, file the same.

Sincerely,

/s/

William N. Sinclair

Cc: All Counsel of Record